

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**C. M. COLLINS, N. J. LUNDY, and R.** §

**C. L. MAYS, individually, and on behalf**  
***of all others similarly situated,*** §

**Plaintiffs,** §

v. §

**NO. 4:22-CV-1073-SDJ**

**CATASTROPHE RESPONSE UNIT,  
INC. and CATASTROPHE RESPONSE  
UNIT USA, INC.,** §

**Defendants.** §

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE  
TO EXCEED PAGE LIMITS FOR PLAINTIFFS' MOTION FOR NOTICE**

Plaintiffs C.M. Collins, N.J. Lundy, and R.C.L. Mays, individually and on behalf of all others similarly situated, hereby file this Unopposed Motion for Leave to Exceed Page Limits for Plaintiffs' Motion for Notice and would respectfully show the Court the following:

1. Plaintiffs have brought this collective action lawsuit alleging that Defendants have violated the Fair Labor Standards Act ("FLSA"). In particular, the Plaintiffs seek to send notice to a group of similarly situated desk adjusters who were misclassified as independent contractors and paid a day rate by Defendants.

2. Simultaneous with the filing of this Motion for Leave, Plaintiffs are filing their Motion for Notice, which contains a detailed analysis of the facts of the case and the applicable law. It also contains an analysis as to why Plaintiffs' proposed Notice to similarly situated individuals is appropriate.

3. The Local Rules limit a non-dispositive motion to fifteen pages in length, excluding attachments, unless leave of court is first obtained. Local Rule CV-7(a)(2).

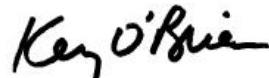
4. Plaintiffs' motion is 18 pages long, excluding attachments.

5. Given the arguments presented and so that the Court has full and complete information to decide the Motion, Plaintiffs hereby request leave of Court to exceed the page limit in the Local Rules.

6. On November 27, 2023, Plaintiffs' counsel conferred with counsel for Defendants, who indicated they are unopposed to the relief requested herein.

For the foregoing reasons, Plaintiffs respectfully ask this Court to grant this Motion for Leave to Exceed Page Limits.

Respectfully submitted,



**Kerry V. O'Brien**  
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**COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF CONFERENCE**

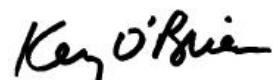
I certify that on November 27, 2023, Plaintiffs' counsel conferred with counsel for Defendants, who indicated they are unopposed to the relief requested herein.



Kerry V. O'Brien

**CERTIFICATE OF SERVICE**

I certify that on November 28, 2023, a true and correct copy of the foregoing document was filed through the Court's electronic case filing system, which will serve a copy of this document on all counsel of record.



Kerry V. O'Brien